

REMARKS

The Office Action dated August 13, 2009, has been received and carefully noted. The above amendments and the following remarks are being submitted as a full and complete response thereto. Claims 1, 15-16 and 20-41 are pending in this application. By this Amendment, claims 1, 15, 16, 27, 30 and 32 are amended. Support for the subject matter of the amendments to claims 1, 15, 16 and 30 can be found in the Specification at, for example, pages 7-8. Claims 27 and 32 are amended for clarification purposes only. No new matter has been added. Reconsideration of the application is respectfully requested.

The Office Action objects to claim 27 because of informalities. Claim 27 is amended to overcome the objection. Accordingly, withdrawal of the objection to claim 27 is respectfully requested.

The Office Action rejects claims 1, 21 and 23 under 35 U.S.C. § 102(e) as being anticipated by Brazier (U.S. Patent No. 6,686,952); claims 15-16, 20 and 22 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Dickinson (U.S. Patent No. 5,602,585); claims 24 and 27-30 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Conoval (U.S. Patent No. 6,400,903); claims 25 and 26 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Gilbert (U.S. Patent No. 6,337,683); claims 31 and 32 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Conoval and further in view of Monroe (U.S. Patent Application Publication No. 2004/0008253); claim 33 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Dickinson and Cutaia (U.S. Patent Application Publication No. 2002/0004390);

claim 34 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Nayar (U.S. Patent No. 6,215,519); claim 35 under 35 U.S.C. § 103(a) as being obvious over Brazier and Conoval in view of Nayar; claims 36 and 37 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Dickinson and Nayar; claim 38 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Fettke (Digital Image Computing Technique and Application; Jan. 2002; pp. 1-6); claim 39 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Conoval and Fettke; and claims 40-41 under 35 U.S.C. § 103(a) as being obvious over Brazier in view of Dickinson and Fettke. It is noted that claims 1, 15, 16 and 30 have been amended. To the extent that the rejections remain application to the claims as amended, they are respectfully traversed.

In particular, the above-identified application claims a surveillance device comprising a support constructed and arranged to be secured to a structure, a first image collection device secured to the support, a second image collection device and a servo motor, the second image collection device being moveable and having an optical axis whereby the servo motor is constructed and arranged to regulate the direction of the optical axis of the second image collection device, wherein the support comprises a plurality of mounting sockets for the first image collection device and second image collection device, the plurality of mounting sockets being disposed regularly and circumferentially about an axis of the support, the first collection device and second image collection device being thereby fixedly secured to the support, as recited in amended claim 1, and as similarly recited in amended claims 15, 16 and 30.

None of the applied references disclose or suggest the claimed features of the support comprising a plurality of mounting sockets for the first image collection devices, the plurality of mounting sockets being disposed regularly and circumferentially about an axis of the support, as recited in claims 1, 15, 16 and 30, as amended. It should be noted that Brazier's slots 16 do not correspond to the claimed mounting sockets because the slots 16 are merely spaces provided in the sensor disc member 15, and the motion sensors 30 are disposed in the slots. Accordingly, no mounting sockets are needed in the assembly of Brazier. Conoval as cited teaches a remote camera relay and apparatus for remotely operating a self-contained digital camera (Abstract), but fails to cure the above deficiencies of Brazier. None of the other applied references disclose or suggest a support comprising a plurality of mounting sockets for the first image collection device and second image collection device, the plurality of mounting sockets being disposed regularly and circumferentially about an axis of the support, as recited in claims 1, 15, 16 and 30.

Brazier as cited teaches a surveillance security system for detecting and monitoring movement upon one's property (Abstract). The Office Action admits that Brazier teaches motion sensors 30, and that the motion sensors are not camera devices (Office Action, page 4, lines 6-17). Applicants respectfully submit that the motion sensors are not only distinct from camera devices, motion sensors are also distinct from being image collection devices, as recited in the claims. The Applicants submit that motion sensors detect motion but do not necessarily capture an image. Brazier teaches a single video camera 32, but fails to teach more than one camera.

Although the Examiner admits the above, the Examiner asserts that Dickinson render the above claimed features obvious because “a low cost compact security camera can be used for detecting motion” (Office Action, page 5, lines 3-6). However, a closer examination of Dickinson as cited reveals that Dickinson teaches that the “camera and motion detector arrangement” have drawbacks of bulk and cost, and that a “camera with built-in motion detector” is preferable (Col. 1, lines 23-46). In other words, Dickinson as cited does not substitute a motion detector with a camera, but merely uses a camera that can detect motion, which is contrary to the statement in the Office Action that Dickinson teaches “substituting Motion (*sic*) sensors with cameras” (Office Action, page 5, lines 3-6). Accordingly, combining the teachings of Brazier with the teachings of Dickinson would not result in substituting the motion detector of Brazier with cameras. Additionally, Brazier already teaches a video camera 32, and thus adding an additional camera instead of the motion detector 30 would be redundant.

For at least the above combination of reasons, claims 1, 15, 16 and 30, as amended, are patentable over all the applied references. Claims 20-41, at least for their dependence on patentable claims 1, 15, 16 and 30, and for their added features, are also patentable over the applied references. As a result, all the pending claims are patentable over all the applied references, and withdrawal of the rejections of the claims under 35 U.S.C. § 102(e) and 35 U.S.C. § 103(a) is respectfully requested.

Should the Examiner determine that any further action is necessary to place this application into better form for allowance, the Examiner is encouraged to telephone the undersigned representative at the number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, referencing Attorney Dkt. No. 025538-00160.

Respectfully submitted,



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Attachment: Petition for Extension of Time (three months)

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